

Vicki Aznaran

19 May 1994

I, VICKI J. AZNARAN, hereby declare as follows:

1. I am over 18 years of age and a resident of the State of Texas. I have personal knowledge of the matters set forth herein and, if called upon to do so, could and would competently testify thereto.
2. From 1972 until 1987, I was a member of various Church of Scientology ("Church") entities. During that time I held a number of senior positions in the corporate and ecclesiastic hierarchy of the Church.
3. From 1981 onward I knew both Vaughn and Stacy Young, whom I met and had contact with as a result of my work as a staff member in the Church of Scientology. I am familiar with their positions in the Church.
4. In my staff capacities in the early 1980s, and later in my executive positions in the Religious Technology Center, I was directly or closely involved in meetings with senior staff members of various Church corporations. These senior staff made significant or major decisions which affected the future of the Church. I know that neither Vaughn nor Stacy Young were included in such senior decision-making processes. They were never senior or key Church executives. They were not consulted regarding, nor were they privy to, the meetings where major issues were discussed and decisions made.
5. I am informed that the Youngs have made claims to specialized knowledge about the corporate status and structure of the Church. Such claims are false. Neither of the Youngs were in a position to have detailed knowledge of the corporate and fiscal structures and operations of any Church of Scientology. In fact, Vaughn Young worked in the area of Public Relations for the entire time that I was acquainted with him. Stacy was primarily a writer in the Church public relations department.
6. Another false allegation is Vaughn Young's claim to be not only knowledgeable about but personally affected by a dispute in 1986 and 1987 between David Miscavige and Pat Broeker concerning Scientology scriptures. I was with Broeker during this period and was aware of this situation. To my knowledge Vaughn Young was not in a position to know what happened during this dispute.
7. That Vaughn and Stacy Young are experts is not true. They are being called experts not due to expertise in Scientology but in order to collect insurance money for their testimony. When Graham Berry retained me for \$2,500 to write declarations, he made it clear to me he would get me classified as an "expert" so the insurance company would pay.
8. What this creates, and what the Youngs are part of, is a stable of people who, for pay, write declarations. The Fishman case is a good example. Neither the Youngs nor I have ever met Steve Fishman.
9. Stacy Young apparently claims special expertise regarding Scientology scriptures. This is just another part of the sham that has been erected around this litigation. She doesn't hold herself out as an "expert" in her life outside of this litigation. It is only when testimony is needed for Mr. Berry that the "expert" title is used.
10. To give an example of how this "expert" plan works, Vaughn Young claims, as an "expert," that Steven Fishman was known and discussed by senior Church executives and staff. For years in the mid-1980s I was one of the highest ranking executives in all of the Churches of Scientology. Furthermore, I never heard David Miscavige or Marc Yager, whom I had regular contact with, ever mention his name. Thus it is inconceivable to me that Vaughn Young would have heard any Church staff member or executive talk about Fishman. He was not in a position to know and I was.
11. The Youngs rely on innuendo to make allegations under the guise of "expert knowledge." Here are some specific examples: a) that End of Cycle within the Church means committing suicide. There is no such policy and in fact this is totally contrary to Church policy and they know this; b) that members of the Church are involved in murder of adversaries. This never occurred at any time and it is a lie that anyone connected with the Church would recognize including the Youngs; c) Vaughn Young implied that there might be something suspicious about the

death of L. Ron Hubbard. This is a fictitious scandal. I was a senior executive and can state that L. Ron Hubbard's death was not by anything other than natural causes; d) inferring that the death of Flo Barnett was covered up by Mr. Miscavige. There was never any question that the cause of her death was due to self-inflicted gunshot wounds. Additionally, the facts are that there was never any order by David Miscavige or anyone else to keep the matter quiet. If such an order existed, I would have known about it; e) an additional forum in which this false information is spread in FACTNET. This is a computer base which seeks to create the impression that Scientology is somehow responsible for the deaths of certain individuals. Anyone who knows Scientology or has been involved with it knows this is not realistic.

12. The above are examples of the falsehood and innuendo created by the stable of false "expert" witnesses that has been created here.

I declare under the penalty of perjury under the laws of the United States of America, and under the laws of each individual state thereof, including the laws of the states of California and Texas, that the foregoing is true and correct.

Executed this 19th day of May, 1994 in Dallas, Texas.

Vicki Aznaran

